

RECEIVED  
KING COUNTY, WASHINGTON

AUG - 6 2020

KNT DEPARTMENT OF  
JUDICIAL ADMINISTRATION

**IN THE SUPERIOR COURT OF THE STATE OF  
WASHINGTON  
FOR KING COUNTY**

**CHUCK PILLON**

Plaintiff, Pro Se

NO.

**20-2-12287-4 KNT**

**SUMMONS**

AND COMPLAINT IN THE

MATTER OF THE

LAWSUIT ATTACHED.

Vs.

**KING COUNTY WASHINGTON**

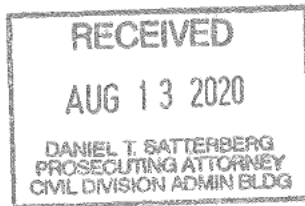
Defendant.

TO KING COUNTY...WA.

YOU ARE HEREBY NOTIFIED OF THE ENCLOSED LAWSUIT FILED IN KING COUNTY SUPERIOR COURT. YOU HAVE 20 DAYS TO RESPOND TO PLAINTIFF AND THE COURT. FAILURE WILL RESULT IN A MOTION FOR DEFAULT BY PLAINTIFF,

  
\_\_\_\_\_  
PRO SE

PROS



RECEIVED  
KING COUNTY, WASHINGTON

AUG - 6 2020

KNT DEPARTMENT OF  
JUDICIAL ADMINISTRATION

**IN THE SUPERIOR COURT OF THE STATE OF  
WASHINGTON  
FOR KING COUNTY**

**CHUCK PILLON**

**Plaintiff, Pro Se**

**Vs.**

**KING COUNTY WASHINGTON**

**Defendant.**

**20-2-12287-4KNT**

**NO.**

**COMPLAINT OF TORT INJURY  
TO PLAINTIFF BY THE OFFICE OF  
THE KING COUNTY CLERK...  
IN THE PERSON OF Ms.  
BARBARA MINER.  
(Unlawful seizure of Protected  
Pension Funds)**

**AUTHORITY FOR THIS COMPLAINT.**

1 THIS COMPLAINT IS BROUGHT UNDER THE AUTHORITY AND CLEAR LANGUAGE OF  
R.C.W. TITLE SIX...SECTION 6.15.020...PARAGRAPHS ONE, TWO, AND THREE.

2 This R.C.W. Section...in these paragraphs)... expressly forbids the seizure of any  
Public Pension monies by any actor(s) for any cause arising from any source. This  
prohibition includes Superior Court judgements.

3 For purposes of brevity and continuity...appropriate excerpts from TITLE  
SIX...(included below)~~as Pages....~~)...and the email exchange between myself and  
the Defendant's staff will be woven into the narrative of this Complaint...and the  
source documents will be affixed to the finished Complaint

4 The R.C.W. language is clear and unequivocal. It states in part that: ...

5 ***(1)...“IT IS THE POLICY OF THE STATE OF WASHINGTON TO ENSURE THE  
WELFARE OF ITS CITIZENS...BY PROTECTING RETIREMENT INCOME”...UNDER  
THE AUTHORITY GRANTED THE STATE UNDER 11 USC”...***

6 ***Further in Paragraph (3) it goes on to state in part that...”THE RIGHT  
OF A PERSON TO A PENSION ACCRUED TO ANY CITIZEN OF THE STATE...UNDER  
ANY EMPLOYEE PENSION PLAN SHALL BE EXEMPT FROM EXECUTION...OR  
SEIZURE...BY OR UNDER ANY LEGAL PROCESS WHATEVER”...***

7 **STAFF CONFIRMATION**

8 In person and by EMAIL (accompanying this Pleading) staff members of  
the KING COUNTY CLERK's OFFICE have confirmed that they are aware of this  
prohibition...**and that it is the OFFICE's policy to observe it faithfully.**

9 In the matter of this COMPLAINT...I was fined and required to pay incrementally  
on a \$3.8,000,000 civil penalty on a SPECULATIVE CLAIM ABOUT A COMPOST  
PILE...(the fine itself unlawful in fact)... by the State. After some months my  
private funds ran out.

1 Coincidentally...at this point an agent/supervisor of the DEFENDANT's staff  
2 insisted arbitrarily that the incremental payment be INCREASED FROM \$300 TO  
3 \$1000 per month. I explained that (b) (6) and my funds were limited at that  
4 time.

5 The staffer did not make any inquiry as to the origin of my income...even with  
6 knowledge of my income source. That exchange took place circa June 2019...and I  
7 made those increased \$1000 payments for a period of eight months.

8 Finally...facing extreme financial hardship...I inquired of Defendant's Office if they  
9 were somehow exempted from the Law protecting Pension Money? My first  
inquiry was in person...subsequent exchanges were both by phone and EMAIL.

10 In every such exchange...the CLERK's Staff was prompt and forthright. They  
11 stated very clearly that they certainly observed the PENSION PROTECTION LAW(s)  
12 without exception! Specifically...that that Office did not demand or accept  
13 Protected Pension monies. A series of EMAILS followed...including a first one to  
14 Ms. Barbara Miner at the suggestion of Ms. Amanda Rennie...with whom I had  
15 telephonic contact.

16 On Wednesday Feb. 19<sup>th</sup> 2019 I sent said EMAIL to Ms. Miner detailing my  
17 concerns and it is included here as Page7... (following). I did not hear directly from  
18 Ms. Miner...but as I said above Ms. Rennie took the matter up apparently at the  
19 direction of Ms. Miner.

1 A phone conversation with Ms. Rennie followed in the interim here. Again She confirmed that my money should be returned and the matter was in her hands.

2 Then...on Thursday March 5<sup>th</sup> at 7:46 A.M. Ms. Rennie sent along an email that indicated she was "STILL WORKING ON (MY) REQUEST" but that "most of the monies...had been remitted to Public Health". She did not however offer any  
3 information that demonstrated that "PUBLIC HEALTH" was exempt from the Pension Protection Law. Ms. Rennie did ask for information on my pension receipt  
4 timeline.

5 I sensed then that Ms. Rennie had been unknowingly drawn into some delaying strategy. That email is Page 8A (below).

6 Later that day...then...at 1:44 P.M. ...I sent along the timeline information requested. I did also go on to summarize my concerns about the mysterious delays in the matter. That whole email exchange is also included here as Page 8B.  
7 (The computer juxtaposed some of the timeline on the printout so I have lettered the exchanges alongside to aid the reader).

8 On March 6<sup>th</sup> then...Ms. Rennie emailed that she "had not (yet) reached out to PUBLIC HEALTH or any other Agency" about this case...stating that "this process is  
9 taking a while to figure out". Again there was no information/update about exemption(s) to the Law....as a reason for delay. This made it clear to me that

1 some other "process" was going on...because the language of the Law is so  
succinct that no delay had ever been mentioned before. (Page 8B+).

2 On March 8<sup>th</sup> I sent the final email in this series with the Clerk's Office Staff. It is  
below as (Page 8C.)

3 On March 13<sup>th</sup> 2020... I sent Ms. Miner an EMAIL trying to bring some reasonable  
4 focus to all this...(Page 9 below) I have heard nothing since from Ms. Miner or her  
staff.

### 5 **CONCLUSION.**

6 The Office of the King County Clerk...has illegally taken Protected Pension Monies  
from me. The facts of this matter are indelibly recorded and not subject to  
7 dispute. Initial acknowledgement that this was improper...even if  
inadvertent...and assurances given to me that the matter would be promptly  
corrected with the return of said money...have not been fulfilled.

8 Only one reason for this delay/failure has been offered. That is that the Clerk's  
Office has to check with other Agencies...including specifically the King County  
9 Health Department. No authority for any Agency or individual to retain this  
money has been cited. Indeed no such retention of Protected Pension Funds is  
possible.

This certainly includes the Health Department. In the full scope of the State's

1 cynical exercise in falsely convicting me of certain crimes...all field investigations  
by the State and the U.S. EPA disproved any impact on Public Health.

2 To repeat...the R.C.W. states emphatically that **NO LAWFULLY ENTITLED PENSION**  
**MONEY...OWED AND DESIGNATED TO THE BENEFIT OF ANY CITIZEN OF THIS**  
3 **STATE...MAY BE SEIZED BY ANY LEGAL PROCESS WHATEVER.**

4 ALL REPRESENTATIONS IN THIS PLEADING ARE MADE...TO THE BEST OF MY  
RECOLLECTION AND RECORDS... UNDER PENALTY OF PERJURY UNDER THE LAWS  
OF THE STATE OF WASHINGTON

5 **RELIEF REQUESTED.**

6 I want my money back! I ask the Court to order the prompt return of all monies  
unlawfully taken by Defendant from my protected pension fund.

7 And in addition... I argue that a penalty of Fifty Percent of that total be imposed as  
well. The loss of the opportunity to spend that money constructively in this  
inexcusable interim has been very real. Not to mention here the cost in time and  
8 money in preparing and executing this recovery lawsuit.

AT RENTON WASHINGTON...AUGUST 4<sup>th</sup>...2020.



XX

CHUCK PILLON

Payments on 16-1-05983-1 KNT.

From: Chuck Pillon (b) (6)

To: barbara.miner@kingcounty.gov

Date: Wednesday, February 19, 2020, 12:04 PM PST

Hello Ms. Miner...

I have been making payments on a civil penalty that arises from this case. It is a \$4 Million Dollar penalty for a compost pile on my rural King County Property. I was originally ordered to pay \$300.00 per month. I fell behind about \$1500 dollars was jailed to force me to catch up. Then the payment.. was precipitously increased to \$1000.00 per month and I have paid up through this month for fear of being jailed again

Recently I was informed that I cannot be forced to pay this penalty from my Pension Funds...which are the only income source I have, I was informed that both Federal and State Law protect pension money from such intrusion. Recently I checked with your staff there at the Court House and they confirmed this.

They informed me to notify you and request a review of the situation. According to State Law I am not only not required to surrender any further pension money...and am entitled to reimbursement of all past payment monies paid in this matter.

I am providing copies of my IRS 1099 forms for 2019. I do not wish to provide my tax returns for privacy reasons,.. but as I certify below ..these are the only income I have received for many years now: **TO WIT"**

.....

**I HEREBY CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE INCOME RECORDS FROM THE STATE L.E.O.F.F. PENSION FUND...THE SEATTLE CITY PENSION FUND...AND MY SOCIAL SECURITY PENSION FUND(s) ARE THE RECORDS OF MY SOLE INCOME FOR 2019.**

**AT RENTON WA. FEBRUARY 16TH...2020...**

**CHUCK PILLON.**

Please reply as soon as possible so as to lift this unwarranted burden from me and my family

PAGE 7



That should have been the end of it...but the Court refused to vacate the Penalty....in spite of clear EIGHTH AMENDMENT LAW THAT FORBIDS SUCH A TACTIC. I remain embroiled in conflict over this matter of course.

As to the "PUBLIC HEALTH" being a VICTIM? of mine then...there is not now or ever has been any entry or pleading from any PUBLIC HEALTH entity claiming any injury or loss attributable to me. The PUBLIC SERVICE has simply been a convenient "cut-out" to dispose of my money while maintaining further prejudice against me.

I do not record this all in any effort to confuse you all there at the Clerk's Office. What I do ask is that you consult with whatever Deputy Prosecuting Attorney is assigned to your Office for clarity if in fact there is any third party intrusion into you decision. The Law on Pension Protection is clear...and I am encouraged that you and your staff have been clear about this from the start.

As an additional request please let me know which DPA does consult with your office if you are able.

regards...Chuck Pillon

On Thursday, March 5, 2020, 07:46:58 AM PST, Rennie, Amanda <[amanda.rennie@kingcounty.gov](mailto:amanda.rennie@kingcounty.gov)> wrote:

Good morning Chuck,

SA,

I am still working on your request as most of the monies that you have paid in have been remitted to the victim, Public Health, as restitution gets paid first on court ordered LFOs.

Do you have a date as to when you started receiving your pension benefits, month and year are sufficient.

If you have any questions, please do not hesitate to let me know.

Thank you,

Amanda Rennie

Accounting & Collections Supervisor

King County Judicial Administration

PAGE 8A

(206) 477-8510

[Amanda.Rennie@kingcounty.gov](mailto:Amanda.Rennie@kingcounty.gov)

PAGE 8B

**From:** Chuck Pilon (b) (6)  
**Sent:** Thursday, March 5, 2020 1:44 PM  
**To:** Rennie, Amanda <[Amanda.Rennie@kingcounty.gov](mailto:Amanda.Rennie@kingcounty.gov)>  
**Subject:** Re: 16-1-05983-6

[EXTERNAL Email Notice! ] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Amanda...

I have been drawing my combined City of Seattle/WA. State LEOFF pension since April in 1988. This is the easy part. I had hoped not to have to involve the Clerk's Office in the background of this matter.

However I need to inform you of that background to stay ahead of what now seem likely confusions and delays if the Court and the Attorney General's Office become involved. The trigger here is the mention by you of the "PUBLIC HEALTH" as a victim of mine.

That raises the possibility that some party is going to try to dissuade your office from refunding my funds by raising the spectre of my having injured some public cause or interest. Thus I must fill in the blanks in advance. And I ask that such a maneuver does occur...you inform me ASAP. There is legal action pending in this matter.

Here is the gist of it: The State charged me...and the Judge convicted me...of violating a State law against mishandling (BURYING) litter/solid waste material on my own property. THE STATE NEVER TESTED THE AREA IN QUESTION FOR ANY SUCH BURIED MATTER. THE STATE DESIGNATED THE U.S. EPA TO DO THAT EXCAVATION **AT SOME FUTURE TIME**...BUT STILL CONCOCTED A CIVIL PENALTY OF NEARLY \$4 MILLION AND SENT IT TO YOU FOR ENFORCEMENT **EVEN BEFORE THE EPA COULD ACT.**

Now please note this well:...The EPA did subsequently excavate and test in the area in question...**AND WITHIN 2 HOURS DECLARED THAT NO LITTER OR HAZARDOUS MATERIAL WAS BURIED THERE!!!! And provided a report to the Court. The EPA stated that no cleanup was necessary...and obviously then no penalty was in order.**

PAGE 8B

Re: 16-1-05983-6

PAGE 8C

From: Chuck Pillon (b) (6)

To: amanda.rennie@kingcounty.gov

Date: Sunday, March 8, 2020, 10:56 AM PDT

Hello Amanda...I have a feeling someone in your world still fails to see what you and your colleague have clearly stated...the Office there is well aware that there is no basis whatsoever to hold my pension money...and the fact that someone is having you "reach out to Public Health or any other agency" signals me that someone is still hoping to prevent the lawful return of the money...

as I have said I don't wish to embroil you or any other innocent parties there so I ask again for the name of whatever legal advisor your office relies upon...probably one of the Deputy Prosecuting Attorneys... so I can take the matter up with them and cut to the chase...The Prosecutor has already had a hand in my injury and I intend to address this to that office in the next day or so...I will send you a copy..

regards...Chuck Pillon

On Friday, March 6, 2020, 11:34:10 AM PST, Rennie, Amanda <amanda.rennie@kingcounty.gov> wrote:

Hi Chuck,

8B +

Thank you for the information and background. At this time, I have not reached out to Public Health or any other agency about your case, however I will keep your concerns in mind if I need to reach out to them. If I need to reach out to them for some reason, I will be sure to give you a call first so that you know what is going on.

I will continue to do research on your case to see what the next steps are and keep you informed of them. I am sorry that this process is taking a while to figure out, but I will do better with communicating with you about it in the future.

If you have any questions, please do not hesitate to let me know.

Thank you,

Amanda Rennie

Accounting & Collections Supervisor

King County Judicial Administration

PAGE 8B + 8C

## An Impending Lawsuit...

From: Chuck Pillon (b) (6)

To: barbara.miner@kingcounty.gov

Cc: dan.satterberg@kingcounty.gov; afields@seattletimes.com; corey@coreyevanparkerlaw.com; lkamb@seattletimes.com

Date: Friday, March 13, 2020, 11:27 AM PDT

Hello Ms, Miner...

Since there is no question that the retention of my protected pension monies by your Office...(and I note here...at the direction of the Superior Court) is unlawful...and your very courteous staff have acknowledged awareness of this fact...I must assume some other government office or individual is behind the delay in refunding that money.

I have already in progress a related Lawsuit...and it seems to me that to lift the burden on your staff it is prudent to simply add this delay/refusal to that Lawsuit. That will also clear the way for discovery/disclosure of that source of delay without leaving your Office and staff caught in the middle of what is already and unlawful act by the Court and Prosecutors.

Just for a complete record in every venue I have to address I want to repeat a simple narrative as to the origin of this whole matter.

I WAS CHARGED...AND CONVICTED WITH THE CRIME OF VIOLATING THE SOLID WASTE/HAZARDOUS MATERIAL SECTION OF THE R.C.W.. THE STANDARD PENALTY IS A \$5000 FINE. IN ADDITION THERE IS PROVISION FOR A CLEAN-UP PENALTY IF THE STATE OR ITS DESIGNEE ACTUALLY HAVE TO DO ANY CLEAN-UP.

THE STATE DESIGNATED THE EPA TO DO SUCH CLEAN-UP AT SOME POINT IN THE FUTURE AND FURTHER DESIGNATED A PRECISE AREA ON MY LAND THAT THEY CALCULATED A PENALTY COST FOR. THE STATE CALCULATED AND IMMEDIATELY IMPOSED A \$4 MILLION DOLLAR PENALTY BEFORE ANY CLEAN-UP HAD EVEN BEEN ATTEMPTED. PURE SPECULATION IS UNLAWFUL UNDER THE FEDERAL AND OUR STATE CONSTITUTION

WHEN THE EPA FINALLY TESTED/EXCAVATED THAT AREA ...ONE THE SIZE OF A FOOTBALL FIELD...THEY WERE... WITHIN TWO HRS... TO REPORT AND OFFICIALLY RECORD THAT NO HAZARDOUS MATERIAL WAS FOUND...AND "NO FURTHER WORK (CLEARLY NO CLEAN-UP) WAS NEEDED THERE!!!"

I FILED TO HAVE THIS ABSURD/PUNITIVE/UNLAWFUL PENALTY VACATED...AND INCLUDED THAT REPORT FROM THE EPA. INCREDIBLY THE COURT...CLEARLY IGNORING THE LAW AND EVIDENCE IN THE MATTER...REFUSED TO VACATE...AND THAT PUT THE ONUS ON ME TO FIGHT THE MATTER. IT HAS ALL BEEN UPHILL...BELIEVE ME.

The additional absurdity is that when the EPA was finally done...in spite of all the hysteria the State had fostered...they had disturbed less than one percent of my whole land area...435,000 Square Feet.

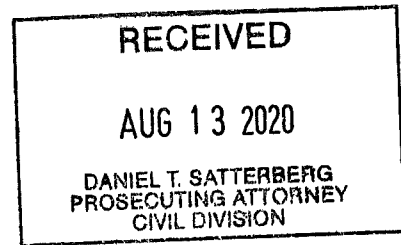
let me say further that it now occurs to me to copy the Prosecutor's Office on this matter even before the Lawsuit is filed...because all you Elected Officials share a sworn oath to uphold the Law. I believe that extends to acting when such clear abuses occur within your purview.

I am sorry that this mess has landed on "your desk" so to speak...

regards...Chuck Pillon

PAGE 9

FILED  
2020 AUG 06  
KING COUNTY  
SUPERIOR COURT CLERK  
  
CASE #: 20-2-12287-4 KNT



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE COUNTY OF KING

CHUCK PILLON	NO. 20-2-12287-4 KNT
Plaintiff(s)	ORDER SETTING CIVIL CASE SCHEDULE
vs	ASSIGNED JUDGE: WILLIAMS, Dept. 41
KING COUNTY WASHINGTON	FILED DATE: 08/06/2020
Defendant(s)	TRIAL DATE: 08/02/2021

A civil case has been filed in the King County Superior Court and will be managed by the Case Schedule on Page 3 as ordered by the King County Superior Court Presiding Judge.

I. NOTICES

**NOTICE TO PLAINTIFF:** The Plaintiff may serve a copy of this **Order Setting Case Schedule (Schedule)** on the Defendant(s) along with the **Summons and Complaint/Petition**. Otherwise, the Plaintiff shall serve the **Schedule** on the Defendant(s) within 10 days after the later of: (1) the filing of the **Summons and Complaint/Petition** or (2) service of the Defendant's first response to the **Complaint/Petition**, whether that response is a **Notice of Appearance**, a response, or a Civil Rule 12 (CR 12) motion. The **Schedule** may be served by regular mail, with proof of mailing to be filed promptly in the form required by Civil Rule 5 (CR 5).

**NOTICE TO ALL PARTIES:**

All attorneys and parties should make themselves familiar with the King County Local Rules [KCLCR] -- especially those referred to in this **Schedule**. In order to comply with the **Schedule**, it will be necessary for attorneys and parties to pursue their cases vigorously from the day the case is filed. For example, discovery must be undertaken promptly in order to comply with the deadlines for joining additional parties, claims, and defenses, for disclosing possible witnesses [See KCLCR 26], and for meeting the discovery cutoff date [See KCLCR 37(g)].

**You are required to give a copy of these documents to all parties in this case.**

## I. NOTICES (continued)

### **CROSSCLAIMS, COUNTERCLAIMS AND THIRD PARTY COMPLAINTS:**

A filing fee of **\$240** must be paid when any answer that includes additional claims is filed in an existing case.

### **KCLCR 4.2(a)(2)**

A Confirmation of Joinder, Claims and Defenses or a Statement of Arbitrability must be filed by the deadline in the schedule. The court will review the confirmation of joinder document to determine if a hearing is required. If a Show Cause order is issued, all parties cited in the order must appear before their Chief Civil Judge.

### **PENDING DUE DATES CANCELED BY FILING PAPERS THAT RESOLVE THE CASE:**

When a final decree, judgment, or order of dismissal of all parties and claims is filed with the Superior Court Clerk's Office, and a courtesy copy delivered to the assigned judge, all pending due dates in this *Schedule* are automatically canceled, including the scheduled Trial Date. It is the responsibility of the parties to 1) file such dispositive documents within 45 days of the resolution of the case, and 2) strike any pending motions by notifying the bailiff to the assigned judge.

Parties may also authorize the Superior Court to strike all pending due dates and the Trial Date by filing a *Notice of Settlement* pursuant to KCLCR 41, and forwarding a courtesy copy to the assigned judge. If a final decree, judgment or order of dismissal of all parties and claims is not filed by 45 days after a *Notice of Settlement*, the case may be dismissed with notice.

**If you miss your scheduled Trial Date**, the Superior Court Clerk is authorized by KCLCR 41(b)(2)(A) to present an *Order of Dismissal*, without notice, for failure to appear at the scheduled Trial Date.

### **NOTICES OF APPEARANCE OR WITHDRAWAL AND ADDRESS CHANGES:**

*All parties to this action must keep the court informed of their addresses.* When a Notice of Appearance/Withdrawal or Notice of Change of Address is filed with the Superior Court Clerk's Office, parties must provide the assigned judge with a courtesy copy.

### **ARBITRATION FILING AND TRIAL DE NOVO POST ARBITRATION FEE:**

A Statement of Arbitrability must be filed by the deadline on the schedule **if the case is subject to mandatory arbitration** and service of the original complaint and all answers to claims, counterclaims and cross-claims have been filed. If mandatory arbitration is required after the deadline, parties must obtain an order from the assigned judge transferring the case to arbitration. **Any party filing a Statement must pay a \$250 arbitration fee.** If a party seeks a trial de novo when an arbitration award is appealed, a fee of \$400 and the request for trial de novo must be filed with the Clerk's Office Cashiers.

### **NOTICE OF NON-COMPLIANCE FEES:**

**All parties** will be assessed a fee authorized by King County Code 4A.630.020 whenever the Superior Court Clerk must send notice of non-compliance of schedule requirements and/or Local Civil Rule 41.

**King County Local Rules are available for viewing at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk).**

## II. CASE SCHEDULE

*	CASE EVENT	EVENT DATE
	Case Filed and Schedule Issued.	08/06/2020
*	Last Day for Filing Statement of Arbitrability without a Showing of Good Cause for Late Filing [See KCLMAR 2.1(a) and Notices on Page 2]. <b>\$220 arbitration fee must be paid</b>	01/14/2021
*	<b>DEADLINE</b> to file Confirmation of Joinder if not subject to Arbitration [See KCLCR 4.2(a) and Notices on Page 2].	01/14/2021
	<b>DEADLINE</b> for Hearing Motions to Change Case Assignment Area [KCLCR 82(e)].	01/28/2021
	<b>DEADLINE</b> for Disclosure of Possible Primary Witnesses [See KCLCR 26(k)].	03/01/2021
	<b>DEADLINE</b> for Disclosure of Possible Additional Witnesses [See KCLCR 26(k)].	04/12/2021
	<b>DEADLINE</b> for Jury Demand [See KCLCR 38(b)(2)].	04/26/2021
	<b>DEADLINE</b> for a Change in Trial Date [See KCLCR 40(e)(2)].	04/26/2021
	<b>DEADLINE</b> for Discovery Cutoff [See KCLCR 37(g)].	06/14/2021
	<b>DEADLINE</b> for Engaging in Alternative Dispute Resolution [See KCLCR 16(b)].	07/06/2021
	<b>DEADLINE:</b> Exchange Witness & Exhibit Lists & Documentary Exhibits [KCLCR 4(j)].	07/12/2021
*	<b>DEADLINE</b> to file Joint Confirmation of Trial Readiness [See KCLCR 16(a)(1)].	07/12/2021
	<b>DEADLINE</b> for Hearing Dispositive Pretrial Motions [See KCLCR 56; CR 56].	07/19/2021
*	Joint Statement of Evidence [See KCLCR 4 (k)]	07/26/2021
	<b>DEADLINE</b> for filing Trial Briefs, Proposed Findings of Fact and Conclusions of Law and Jury Instructions (Do not file proposed Findings of Fact and Conclusions of Law with the Clerk)	07/26/2021
	Trial Date [See KCLCR 40].	08/02/2021

The \* indicates a document that must be filed with the Superior Court Clerk's Office by the date shown.

## III. ORDER

Pursuant to King County Local Rule 4 [KCLCR 4], IT IS ORDERED that the parties shall comply with the schedule listed above. Penalties, including but not limited to sanctions set forth in Local Rule 4(g) and Rule 37 of the Superior Court Civil Rules, may be imposed for non-compliance. It is FURTHER ORDERED that the party filing this action **must** serve this *Order Setting Civil Case Schedule* and attachment on all other parties.

DATED: 08/06/2020



\_\_\_\_\_  
PRESIDING JUDGE



#### IV. ORDER ON CIVIL PROCEEDINGS FOR ASSIGNMENT TO JUDGE

**READ THIS ORDER BEFORE CONTACTING YOUR ASSIGNED JUDGE.**

This case is assigned to the Superior Court Judge whose name appears in the caption of this case schedule. The assigned Superior Court Judge will preside over and manage this case for all pretrial matters.

**COMPLEX LITIGATION:** If you anticipate an unusually complex or lengthy trial, please notify the assigned court as soon as possible.

**APPLICABLE RULES:** Except as specifically modified below, all the provisions of King County Local Civil Rules 4 through 26 shall apply to the processing of civil cases before Superior Court Judges. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**CASE SCHEDULE AND REQUIREMENTS:** Deadlines are set by the case schedule, issued pursuant to Local Civil Rule 4.

**THE PARTIES ARE RESPONSIBLE FOR KNOWING AND COMPLYING WITH ALL DEADLINES IMPOSED BY THE COURT'S LOCAL CIVIL RULES.**

**A. Joint Confirmation regarding Trial Readiness Report**

No later than twenty one (21) days before the trial date, parties shall complete and file (with a copy to the assigned judge) a joint confirmation report setting forth whether a jury demand has been filed, the expected duration of the trial, whether a settlement conference has been held, and special problems and needs (e.g., interpreters, equipment).

The Joint Confirmation Regarding Trial Readiness form is available at [www.kingcounty.gov/courts/scforms](http://www.kingcounty.gov/courts/scforms). If parties wish to request a CR 16 conference, they must contact the assigned court. Plaintiff's/petitioner's counsel is responsible for contacting the other parties regarding the report.

**B. Settlement/Mediation/ADR**

a. Forty five (45) days before the trial date, counsel for plaintiff/petitioner shall submit a written settlement demand. Ten (10) days after receiving plaintiff's/petitioner's written demand, counsel for defendant/respondent shall respond (with a counter offer, if appropriate).

b. Twenty eight (28) days before the trial date, a Settlement/Mediation/ADR conference shall have been held. FAILURE TO COMPLY WITH THIS SETTLEMENT CONFERENCE REQUIREMENT MAY RESULT IN SANCTIONS.

**C. Trial**

Trial is scheduled for 9:00 a.m. on the date on the case schedule or as soon thereafter as convened by the court. The Friday before trial, the parties should access the court's civil standby calendar on the King County Superior Court website [www.kingcounty.gov/courts/superiorcourt](http://www.kingcounty.gov/courts/superiorcourt) to confirm the trial judge assignment.

**MOTIONS PROCEDURES**

**A. Noting of Motions**

**Dispositive Motions:** All summary judgment or other dispositive motions will be heard with oral argument before the assigned judge. The moving party must arrange with the hearing judge a date and time for the hearing, consistent with the court rules. Local Civil Rule 7 and Local Civil Rule 56 govern procedures for summary judgment or other motions that dispose of the case in whole or in part. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**Non-dispositive Motions:** These motions, which include discovery motions, will be ruled on by the assigned judge without oral argument, unless otherwise ordered. All such motions must be noted for a date by which the ruling is requested; this date must likewise conform to the applicable notice requirements. Rather than noting a time of day, the Note for Motion should state "Without Oral Argument." Local Civil Rule



7 governs these motions, which include discovery motions. The local civil rules can be found at [www.kingcounty.gov/courts/clerk/rules/Civil](http://www.kingcounty.gov/courts/clerk/rules/Civil).

**Motions in Family Law Cases not involving children:** Discovery motions to compel, motions in limine, motions relating to trial dates and motions to vacate judgments/dismissals shall be brought before the assigned judge. All other motions should be noted and heard on the Family Law Motions calendar. Local Civil Rule 7 and King County Family Law Local Rules govern these procedures. The local rules can be found at [www.kingcounty.gov/courts/clerk/rules](http://www.kingcounty.gov/courts/clerk/rules).

**Emergency Motions:** Under the court's local civil rules, emergency motions will usually be allowed only upon entry of an Order Shortening Time. However, some emergency motions may be brought in the Ex Parte and Probate Department as expressly authorized by local rule. In addition, discovery disputes may be addressed by telephone call and without written motion, if the judge approves in advance.

**B. Original Documents/Working Copies/ Filing of Documents:** All original documents must be filed with the Clerk's Office. Please see information on the Clerk's Office website at [www.kingcounty.gov/courts/clerk](http://www.kingcounty.gov/courts/clerk) regarding the requirement outlined in LGR 30 that attorneys must e-file documents in King County Superior Court. The exceptions to the e-filing requirement are also available on the Clerk's Office website. The local rules can be found at [www.kingcounty.gov/courts/clerk/rules](http://www.kingcounty.gov/courts/clerk/rules).

The working copies of all documents in support or opposition must be marked on the upper right corner of the first page with the date of consideration or hearing and the name of the assigned judge. The assigned judge's working copies must be delivered to his/her courtroom or the Judges' mailroom. Working copies of motions to be heard on the Family Law Motions Calendar should be filed with the Family Law Motions Coordinator. Working copies can be submitted through the Clerk's office E-Filing application at [www.kingcounty.gov/courts/clerk/documents/eWC](http://www.kingcounty.gov/courts/clerk/documents/eWC).

**Service of documents:** Pursuant to Local General Rule 30(b)(4)(B), e-filed documents shall be electronically served through the e-Service feature within the Clerk's eFiling application. Pre-registration to accept e-service is required. E-Service generates a record of service document that can be e-filed. Please see the Clerk's office website at [www.kingcounty.gov/courts/clerk/documents/efiling](http://www.kingcounty.gov/courts/clerk/documents/efiling) regarding E-Service.

**Original Proposed Order:** Each of the parties must include an original proposed order granting requested relief with the working copy materials submitted on any motion. **Do not file the original of the proposed order with the Clerk of the Court.** Should any party desire a copy of the order as signed and filed by the judge, a pre-addressed, stamped envelope shall accompany the proposed order. The court may distribute orders electronically. Review the judge's website for information: [www.kingcounty.gov/courts/SuperiorCourt/judges](http://www.kingcounty.gov/courts/SuperiorCourt/judges).

**Presentation of Orders for Signature:** All orders must be presented to the assigned judge or to the Ex Parte and Probate Department, in accordance with Local Civil Rules 40 and 40.1. Such orders, if presented to the Ex Parte and Probate Department, shall be submitted through the E-Filing/Ex Parte via the Clerk application by the attorney(s) of record. E-filing is not required for self-represented parties (non-attorneys). If the assigned judge is absent, contact the assigned court for further instructions. If another judge enters an order on the case, counsel is responsible for providing the assigned judge with a copy.

**Proposed orders finalizing settlement and/or dismissal by agreement of all parties shall be presented to the Ex Parte and Probate Department.** Such orders shall be submitted through the E-Filing/Ex Parte via the Clerk application by the attorney(s) of record. E-filing is not required for self-represented parties (non-attorneys). Formal proof in Family Law cases must be scheduled before the assigned judge by contacting the bailiff, or formal proof may be entered in the Ex Parte Department. **If final order and/or formal proof are entered in the Ex Parte and Probate Department, counsel is responsible for providing the assigned judge with a copy.**

### C. Form

Pursuant to Local Civil Rule 7(b)(5)(B), the initial motion and opposing memorandum shall not exceed 4,200 words and reply memoranda shall not exceed 1,750 words without authorization of the court. The word count

includes all portions of the document, including headings and footnotes, except 1) the caption; 2) table of contents and/or authorities, if any; and 3) the signature block. Over-length memoranda/briefs and motions supported by such memoranda/briefs may be stricken.

***IT IS SO ORDERED. FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ORDER MAY RESULT IN DISMISSAL OR OTHER SANCTIONS. PLAINTIFF/PETITIONER SHALL FORWARD A COPY OF THIS ORDER AS SOON AS PRACTICABLE TO ANY PARTY WHO HAS NOT RECEIVED THIS ORDER.***



---

PRESIDING JUDGE